

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

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GERARD LAFFAN, individually and on behalf of all others similarly situated,

Plaintiff,

vs.

SANTANDER BANK, N.A., et al.

Defendants.

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Civil Action No. 5:13-CV-04040-JLS

**PLAINTIFF’S UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF  
CLASS ACTION SETTLEMENT, CERTIFYING CLASS FOR SETTLEMENT  
PURPOSES, DIRECTING THE ISSUANCE OF CLASS NOTICE,  
AND SCHEDULING FINAL APPROVAL HEARING**

Plaintiff Gerard Laffan, on behalf of himself and all others similarly situated, (“Plaintiff”), respectfully submits his Unopposed Motion for Preliminary Approval of Class Action Settlement, Preliminary Certification of Settlement Class, Appointment of Class Counsel, Approval of Proposed Class Notices, and Scheduling of a Final Approval Hearing. In support thereof, Named Plaintiff has contemporaneously filed a Memorandum of Law and the Declaration of Peter A. Muhic, with exhibits thereto. Defendants Santander Bank, N.A., American Modern Insurance Group, Inc., and Atlas Insurance Agency, Inc. consent, for settlement purposes only, to Plaintiffs’ requested relief contained therein.

For the reasons set forth in the attached memorandum of law, Plaintiff respectfully requests that the Court grant his Unopposed Motion, and enter the accompanying [Proposed] Order Granting Preliminary Approval of Class Action Settlement.

Dated: July 29, 2015

Respectfully submitted,

**KESSLER TOPAZ  
MELTZER & CHECK, LLP**

*s/ Peter A. Muhic*

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Peter A. Muhic (PA 73501)  
Tyler S. Graden (PA 205844)  
Samantha E. Jones (PA 311829)  
280 King of Prussia Road  
Radnor, PA 19087  
Telephone: (610) 667-7706  
Facsimile: (610) 667-7056  
Email: pmuhic@ktmc.com  
Email: tgraden@ktmc.com  
Email: sjones@ktmc.com

**NIX PATTERSON & ROACH, LLP**

Christopher Johnson  
3600 North Capital of Texas Highway  
Building B, Suite 350  
Austin, TX 78746  
Telephone: (512) 328-5333  
Facsimile: (512) 328-5335  
Email: cjohnson@npraustin.com

***Attorneys for Plaintiff and  
The Proposed Class***

**CERTIFICATE OF UNCONTESTED MOTION**

Pursuant to Local Rule 7.1(b), the undersigned hereby certifies that the foregoing Plaintiff's Unopposed Motion for Preliminary Approval of Class Action Settlement, Preliminary Certification of Settlement Class, Appointment of Class Counsel, Approval of Proposed Class Notices, and Scheduling of a Final Approval Hearing is uncontested by Defendants Santander Bank, N.A., American Modern Insurance Group, Inc., and Atlas Insurance Agency, Inc.

Dated: July 29, 2015

*s/ Peter A. Muhic*

Peter A. Muhic (PA 73501)

**CERTIFICATE OF SERVICE**

I hereby certify that on the 29th day of July 2015, a true and correct copy of the foregoing document was filed with the Court utilizing its ECF system, which will send notice of such filing to all counsel of record.

*s/ Peter A. Muhic*

Peter A. Muhic (PA 73501)